



Michael C. Marsh

MEMO ENDORSED

Akerman LLP
Three Brickell City Centre
98 Southeast Seventh Street
Suite 1100
Miami, FL 33131

T: 305 374 5600
F: 305 374 5095

November 13, 2019

VIA ECF

The Honorable Ona T. Wang
Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 20D
New York, NY 10007

Re: *ExpertConnect, LLC, v. Mayokia Fowler, et al.* Case No. 18-cv-4828 (LGS) (OTW)

Dear Judge Wang:

Our firm represents Plaintiff/Counter-Defendant, ExpertConnect, LLC, and Third-Party Defendants Eric C. Broyles and Chris G. Gaudio (collectively "Third-Party Defendants"), and we write to request an extension for the parties' November 15, 2019 joint status letter.

Our firm was retained by Third-Party Defendants' insurance carrier to represent ExpertConnect, and Messrs. Broyles and Gaudio, in the third-party complaint and counter-claims [ECF No. 156] that were filed on July 19, 2019. Since then, our firm and Third-Party Defendants' insurance carrier have been unable to come to an agreement on the hourly rates for Akerman to continue representing the Third-Party Defendants in this matter. As such, it is uncertain whether our firm will remain in the case. We need additional time to resolve this issue, and if necessary, for Third-Party Defendants to obtain substitute counsel.

Currently, the parties' joint status letter is due November 15, 2019. We request that the deadline for the joint status letter be extended to November 22, 2019.

We have conferred with counsel for the other parties in this matter and they have consented to this request for extension. In light of these circumstances, we have also submitted a letter to Judge Schofield requesting an extension for our reply brief in support of our motion to dismiss. Third-Party Defendants have not made any prior requests for an extension of time for the November 15, 2019 joint status letter.

Thank you for Your Honor's consideration.

Sincerely,

s/Michael C. Marsh

Michael C. Marsh

cc: Richard Alan Roth
Stanislav Sharovski
Daryl Earl Davis

Application GRANTED. Joint status letter due
November 22, 2019.

SO ORDERED.



Ona T. Wang 11/14/19
U.S. Magistrate Judge